

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**ORDER TO SHOW CAUSE  
FOR CONTEMPT AND FOR AN  
ORDER OF ATTACHMENT  
PURSUANT TO RULE 64 OF THE  
FEDERAL RULES OF CIVIL  
PROCEDURE & ARTICLE 62 OF  
THE NEW YORK CIVIL  
PRACTICE LAW & RULES**

**NOTICE: THE PUROSE OF THIS HEARING IS TO PUNISH THE ACCUSED FOR  
A CONTEMPT OF COURT, AND THAT SUCH PUNISHMENT MAY CONSIST OF  
FINE, IMPRISONMENT, OR BOTH, ACCORDING TO LAW.**

**WARNING: YOUR FAILURE TO APPEAR IN COURT MAY RESULT IN YOUR  
IMMEDIATE ARREST AND IMPRISONMENT FOR CONTEMPT OF COURT.**

Upon the Declaration of Carlos Roa, Plaintiff's Memorandum of Law, and all prior  
pleadings and proceedings heretofore had herein,

**LET** the defendants, Safa Abdulrahim Gelardi ("Safa") and Vito Gelardi ("Vito")  
(Safa and Vito collectively hereinafter the "Defendants" or the "Gelardis") show cause  
before the Hon. Pamela K. Chen, U.S.D.J., of this Court to be held at the courthouse thereof,  
located at 225 Cadman Plaza East, Courtroom 4F North, Brooklyn, NY 11201, on the  
day of \_\_\_\_\_ May, 2025 at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon of that day, or as  
soon thereafter as counsel can be heard, why an Order should not be issued:

(a) holding the Gelardis in contempt of this Court's March 8, 2024 Order requiring  
them to notify this Court within three (3) days of entering into any contract to sell their  
ownership interest in any other property, by:

(i) directing that all proceeds from the sale by the Gelardis of any real property be held in escrow pending final disposition of this case;

(ii) ordering case-ending sanctions pursuant to Rule 16(f) of the Federal Rules of Civil Procedure;

(iii) ordering the incarceration of the Gelardis until further Order of this Court pending their compliance with this Court's Orders;

(iv) awarding Plaintiff its damages, costs, and reasonable attorneys' fees incurred in connection with this application; and

(v) for such other and further relief as this honorable Court deems just, equitable, and proper; and it is

**ORDERED**, that pending the hearing and determination of this application, and further order of this Court, the Gelardis shall place the proceeds of the sale of any real estate during the pendency of this litigation in escrow with the Court.

**ORDERED** that service via email made upon the Gelardis shall be deemed good and sufficient service; and it is further

**ORDERED** that answering papers, if any, shall be served via ECF on or before the \_\_\_\_\_ day of \_\_\_\_\_, 2025; and it is further

**ORDERED** that reply papers, if any, shall be filed and served on or before the \_\_\_\_\_ day of \_\_\_\_\_, 2025.

Dated:

**SO ORDERED:**

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Hon. Pamela K. Chen, U.S.D.J.